REMARKS

Consideration of this application is respectfully requested in view of the foregoing amendments and the following remarks.

A.   PTO-1449 Form

In the event the Examiner has considered the references cited on the PTO-1449 form filed by Applicant on October 25, 2005, Applicant respectfully requests that the Examiner initial the form and send an initialed copy to the correspondence address listed below.

B.   Status of Claims and Explanation of Amendments

Claims 1-8 were pending. By this paper, claims 1, 7, and 8 are amended.

Claim 1 is amended to recite, *inter alia*, "An image reproduction apparatus comprising . . . a control unit configured to cause the display unit to successively display a low-resolution image of the plurality of image files at fast speed while the operating unit is in a predetermined operating state, and to display a high-resolution image corresponding to a prior low-resolution image that is a predetermined number of images prior to the latest low-resolution image displayed on the display unit when the operating unit is released from the predetermined operating state, without displaying the prior low-resolution image or a high-resolution image corresponding to the latest low-resolution image." Claims 7 and 8 are similarly amended. Support of these amendments are found throughout the application as originally filed, including, for example, on page 16.

Claim 8 is further amended to recite, *inter alia*, "[a] computer-readable medium storing a computer program . . ." This amendment is not made for any substantial reason related to patentability (§§102, 103). The Office Action's rejection of claim 8 under 35 U.S.C. § 101 is respectfully asserted to be moot.

No new matter is introduced by entry of these amendments, and entry is respectfully requested.

C.   Rejection Under 35 U.S.C. § 103

Claims 1-8 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 5,933,137 to Anderson ("Anderson") in view of U.S. Patent No. 6,850,691 to Stam et al. ("Stam"). (Office Action, pp. 4-7). Applicant respectfully traverses the rejection.

Specifically, Applicant's amended claim 1 recites:

"1. An image reproduction apparatus comprising:

an interface unit connected to a detachable memory configured to store a plurality of image files, each image file having a file structure that includes at least a high-resolution and a low-resolution image for each image;

a display unit configured to display an image file of the plurality of image files stored in the detachable memory that is connected via said interface unit;

an operating unit operated by a user for forwarding an image displayed on the display unit; and

a control unit configured to cause the display unit to successively display a low-resolution image of the plurality of image files at fast speed while the operating unit is in a predetermined operating state, and to display a high-resolution image corresponding to a prior low-resolution image that is a predetermined number of images prior to the latest low-resolution image displayed on the display unit when the operating unit is released from the predetermined operating state, without displaying the prior low-resolution image or a high-resolution image corresponding to the latest low-resolution image."

Anderson is directed to a method and system for accelerating a user interface of an image capture unit during a display mode. Anderson teaches that a medium-resolution screennail image is displayed on an LCD screen (402). (Anderson, Col. 13, Lines 31-32). If the

user presses down and holds button (410), then a "series of screennail images (608) are continually decompressed and displayed . . . until the user releases the button." (Anderson, Col. 13, Lines 35-40). Upon release of the button, compressed image data corresponding to the image currently displayed is fetched, decompressed, resized and displayed. (Anderson, Col. 41-45). Alternatively, the compressed image is first decompressed and resized, then displayed to replace the screennail image. (Anderson, Col. 45-49).

The Office Action admits that Anderson fails to disclose "displaying a high resolution image corresponding to a prior low-resolution image of a predetermined number of images prior to the low-resolution image displayed on the display unit when the operating unit is released from the predetermined operating state, without displaying the prior low-resolution image." (Office Action, p. 5). Rather, the Office Action cites Stam as a reference "only to teach overshoot correction by determining the frame where the user stopped fast-forwarding and start displaying from a point prior to that frame." (Office Action, p. 2). Indeed, the Office Action admits that Stam fails to teach a control unit that "displays a high resolution image corresponding to a prior low-resolution image without displaying the prior low-resolution image." (Office Action, p. 2).

Accordingly, the Office Action argues that Anderson in combination with Stam teaches each element in Applicant's claim 1. It argues that "if Anderson were to correct for the user's overshoot the low-resolution image (screennail image) that is currently on the display [sic] is replaced with a high-resolution image that would correspond to a prior low-resolution image." (Office Action, p. 3). The Office Action reasons that Anderson "does not teach that the prior low-resolution image needs to be displayed first, it only states that the low-resolution being displayed is replaced with a high-resolution image." (Office Action, p. 3).

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Applicant respectfully disagrees with the Office Action's reasoning. The Office Action correctly notes that "Anderson does not teach that the prior low-resolution image needs to be displayed first." Yet, this is only because Anderson does not teach overshoot correction, (as admitted by the Office Action on page 5.) Indeed, according to Anderson's disclosure, the *only* high-resolution image that can be displayed after the button is released is one corresponding to the screennail image that is inevitably displayed by virtue of the user releasing the button (410). There are no other options.

As recited in Applicant's amended claim 1, "each image file [has] a file structure that includes at least a high-resolution and a low-resolution image for each image." According to Anderson, the main image that is displayed when button (410) is released is contained on the same file as the screennail image displayed at that time. (Anderson, Col. 7, Lines 49-55). Anderson does not teach, however, that when the button (410) is released, a high-resolution image is displayed that is unrelated (*i.e.*, not included in the same file) to the low-resolution image on display before the button is released. Anderson therefore does not disclose, teach or suggest an apparatus that automatically displays a prior high resolution image, that is unrelated to the current low-resolution image, *i.e.* contained in a separate file, upon release of the fast-forward button.

Therefore, because Office Action admits that Stam does not disclose a control unit that "displays a high-resolution image corresponding to a prior low-resolution image without displaying the prior low-resolution image," (Office Action, p. 2), then even a combination of Anderson and Stam will not teach each element of Applicant's claim 1.

Accordingly, Anderson fails to teach each element of Applicant's claim 1, and claim 1 is therefore believed to be in condition for allowance. For at least similar reasons,

dependent claims 2-6 are also believed to be in condition for allowance. Further, the above

analysis regarding Applicant's claim 1 is equally applicable to independent claims 7 and 8, and

for at least similar reasons, claims 7 and 8 are also believed to be in condition for allowance.

*   *   *

Applicant has chosen in the interest of expediting prosecution of this patent

application to distinguish the cited documents from the pending claims as set forth above. These

statements should not be regarded in any way as admissions that the cited documents are, in fact,

prior art. Likewise, Applicant has chosen not to swear behind the cited references or to

otherwise submit evidence to traverse the rejection at this time. Applicant, however, reserves the

right, as provided by 37 C.F.R. §§ 1.131 and 1.132, to do so in the future as appropriate. Finally,

Applicant has not specifically addressed the rejections of the dependent claims. Applicant

respectfully submits that the independent claims, from which they depend, are in condition for

allowance as set forth above. Accordingly, the dependent claims also are in condition for

allowance. Applicant, however, reserves the right to address such rejections of the dependent

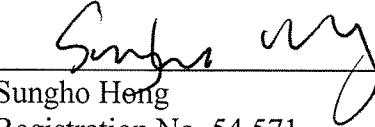claims in the future as appropriate.

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CONCLUSION

This application is respectfully asserted to be in condition for allowance. An early and favorable examination on the merits is requested. In the event that a telephone conference would facilitate the examination of this application in any way, the Examiner is invited to contact the undersigned at the number provided.

THE COMMISSIONER IS HEREBY AUTHORIZED TO CHARGE ANY ADDITIONAL FEES WHICH MAY BE REQUIRED FOR THE TIMELY CONSIDERATION OF THIS AMENDMENT UNDER 37 C.F.R. §§ 1.16 AND 1.17, OR CREDIT ANY OVERPAYMENT TO DEPOSIT ACCOUNT NO. 13-4500, ORDER NO. 1232-5278.

Respectfully submitted,
MORGAN & FINNEGAN, L.L.P.

Dated: April 4, 2008   By: _____
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